

Notes of February 19, 2021 EPA-CES Call

EPA and Cadmus spoke to staff of CES and their consultants about responding to RAI #5 and other issues associated with the CES Mendota project.

CES inquired whether it is acceptable to float the surface casing to address subsidence concerns. EPA is internally discussing ways to relieve stress on the surface casing while meeting the Class VI requirements, but is also interested in CES's experience with this issue, including whether any data are available about this particular well design. This is an iterative issue, and EPA and CES will work together to address it.

EPA updated the Emergency and Remedial Response Plan template and the version CES needs is now available in the GSDT.

CES plans to respond to the questions in RAI #5 by March 5 and will revise the permit application at a later date. They will keep EPA informed about the timing for submitting updated components of the permit application so that EPA can determine whether it is most efficient to wait for the entire application to be resubmitted or to begin reviewing portions as they are uploaded.

The geologist who produced CES's initial site characterization report has since retired and a new geologist is preparing the updated report. CES asked whether it would be acceptable to submit the updated report without the geologist's stamp. EPA will inquire about how to address this need; similar issues have arisen given the inability to obtain physical stamps during the pandemic.

CES hopes to complete the biological report to support the Endangered Species Act review next week and is hoping to complete the cultural report for the National Historic Properties Act evaluation in about 2 weeks. Regarding the biological species report, CES needs to more clearly define the area that will be impacted by the 3D seismic surveys (an area of about 20 square miles). The surveys can be done by truck or by hand; each of which has a slightly different footprint.

CES also inquired about the timing of issuing the UIC permit because they need to acquire other state permits. David explained that there will be a public comment period following issuance of the draft permit (this will likely include a hearing and be longer than the 30 day minimum). Following the public comment period, EPA will evaluate and respond to comments and finalize the permit. The exact timing is difficult to predict, but EPA recognizes that understanding the timing will support CES as it obtains other permits for the site.

EPA asked about CES's interaction with the city of Mendota. EPA performed an EJ screen and certain areas scored high related to linguistically isolated communities, and EPA is curious about what outreach CES is performing. CES replied that they are planning to meet with the mayor and representatives of Fresno County about how best to communicate. Outreach activities may include interacting with the Farm Bureau and preparing bilingual factsheets. CES will keep EPA in the loop on these efforts.